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June 29, 2021

By ECF and email

MEMO ENDORSED

The Honorable Katherine Polk Failla
United States District Judge
United States District Court
40 Foley Square, Room 2103
New York, NY 10007

Re: *U.S. v. Gregoris Martinez*, 19 CR 690-KPF – Motion to Modify Bail Conditions

Dear Judge Failla:

I am writing to request that the Court remove the curfew from the conditions of Mr. Martinez's release on bond. The reason for the request is that returning every afternoon from his fiancée's apartment, which he is in the process of fixing up, to his mother's home, which remains his residence, requires a significant amount of driving and reduces the time Mr. Martinez can spend with his daughter. As the Court is aware, Mr. Martinez has been fully compliant with the conditions of his release for almost two years. On July 24, 2020, the Court modified the conditions of Mr. Martinez's release from home incarceration to a curfew set by Pretrial Services. (*See* ECF Doc. No. 64). The Court has scheduled Mr. Martinez's surrender to the Bureau of Prisons on October 1, 2021. (*See* ECF Doc. No. 161 at 2).

Pretrial Services approves of this request. The government opposes the request and takes the position that the curfew should remain in place.

Thank you for your attention.

Respectfully,



Zachary S. Taylor

cc: Aline Flodr, Esq. (*by ECF and email*)
Joshua Rothman (*by email*)

Application GRANTED.

SO ORDERED.

Dated: June 30, 2021
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE